

# **EXHIBIT 1**

**In re: MOTORS LIQUIDATION COMPANY, et al.,**  
**f/k/a General Motors Corp., et al., No. 09-50026**

**Plaintiffs and Participating Unitholders' Affirmative Designations of the Deposition**  
**Testimony of Beth Andrews and the GUC Trust and New GM's Objections Thereto**

Beth Andrews November 15, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
11:14	11:25	
16:20	16:25	
17:14	18:1	
18:15	18:18	
18:22	18:24	
22:14	22:20	
22:24	22:25	
25:2	25:9	
26:1	26:2	
26:6	26:13	
27:9	27:10	
27:14	27:16	
30:22	31:16	
39:11	39:16	
39:18	40:1	
40:5	40:14	
42:19	42:20	
42:23	43:6	
43:8	43:14	
46:8	47:9	
47:11	47:25	
48:5	49:10	
56:6	56:8	
56:12	56:15	
56:17	56:21	
59:3	59:16	
59:23	60:9	Relevance.
60:11	60:15	Relevance.
60:20	61:10	Relevance.
61:18	64:1	Relevance.
64:5	64:15	Relevance
64:19	64:20	Relevance
70:21	71:6	
71:8	71:9	

Beth Andrews November 15, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
71:16	71:21	Vague and ambiguous; question is incomplete as stated.
72:13	72:15	
72:20	72:20	
72:21	73:25	Mischaracterizes testimony (73:21–73:25).
74:3	74:20	Mischaracterizes testimony (74:3-4).
74:25	75:8	
75:13	75:22	
75:25	76:9	
78:16	80:1	
80:15	81:6	
82:21	84:6	
89:24	90:3	Lack of Foundation (FRE 602)
90:9	90:18	Lack of Foundation (FRE 602)
90:21	90:22	
98:24	99:2	
99:7	99:21	
100:3	100:6	
100:17	100:19	
100:23	101:4	Vague and ambiguous.
101:7	101:8	Vague and ambiguous.
101:11	101:23	Vague and ambiguous; Lack of foundation (FRE 602 (101:13-23))
102:2	102:9	Vague and ambiguous; Lack of foundation (FRE 602) 102:2-3).
103:6	104:11	
104:14	104:22	
104:25	106:14	
107:2	109:2	
109:10	110:22	
110:25	111:21	Mischaracterizes testimony (111:13-21).
111:24	111:25	Mischaracterizes testimony.
115:4	115:7	
118:6	120:16	Calls for speculation; Lack of foundation (FRE 602) (120:12-16).
120:20	121:1	Mischaracterizes testimony; Calls for speculation; Lack of foundation (FRE 602) (120:20-121:1).

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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
121:8	121:15	Mischaracterizes testimony; Calls for speculation; Lack of foundation (FRE 602).
122:5	122:18	
123:19	124:11	
124:23	125:2	
127:4	127:4	
127:10	127:11	
128:24	129:4	
130:22	131:23	
132:2	132:3	
132:12	134:15	
134:24	135:2	
135:5	135:12	
135:24	136:22	Vague and ambiguous; Lack of foundation (FRE 602) (136:15-22).
136:24	137:2	Vague and ambiguous; Lack of foundation (FRE 602).
137:17	138:15	Mischaracterizes testimony (138:10-15).
138:17	138:18	Mischaracterizes testimony.
138:23	139:11	Mischaracterizes testimony; Compound (FRE 611(a)); Lack of foundation (FRE 602) (139:4-11).
139:16	140:15	Mischaracterizes testimony; Compound (FRE 611(a)); Lack of foundation (FRE 602) (139:16); Lack of foundation (FRE 602) (140:9-23).
140:18	140:25	
142:1	143:4	
143:7	143:16	
143:20	144:1	
144:5	145:5	Mischaracterizes testimony; Calls for speculation; Lack of foundation (FRE 602) (145:4-7).
145:7	145:18	
145:21	146:2	
146:6	146:15	
150:15	150:19	

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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
150:22	150:22	
152:1	152:11	
152:15	154:11	Cumulative (154:9-11).
154:15	155:24	Cumulative (154:15–155:1).

**GUC Trust and New GM’s Counter Designations of the Deposition Testimony of Beth Andrews and the Plaintiffs and Participating Unitholders’ Objections Thereto**

Beth Andrews November 15, 2017		
GUC Trust and New GM’s Counter Designations		Plaintiffs and Participating Unitholders’ Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
9:14	10:12	
18:3	18:5	
18:8	18:12	
23:2	23:15	
25:11	25:25	
28:13	28:25	
34:21	35:4	
41:15	41:17	
42:3	42:7	Incomplete/out-of-context (omits the relevant date discussion) (FRE 106); mischaracterizes testimony.
53:17	53:22	
54:24	55:4	
57:3	57:5	
68:6	68:13	This is not a valid counter-designation as it does not “complete” anything affirmatively designated and fairness does not require that it be considered contemporaneously with the designated content (106); Improper opinion evidence (702); Foundation (601, 602).
68:15	68:19	This is not a valid counter-designation as it does not “complete” anything affirmatively

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		designated, and fairness does not require that it be considered contemporaneously with the designated content (106); Improper opinion evidence (702); Foundation (601, 602).
69:23	70:1	Not a valid counter-designation, as fairness or completeness requirements do not necessitate its inclusion with the designated content (106) ; 403 (more confusing than probative); vague and ambiguous; foundation (601, 602).
70:6	70:17	
72:8	72:12	Objection withdrawn if GUC/New GM properly completes the designation by designating the question to which this answer responds.
74:1	74:2	Improper designation of record objections (401-403 – irrelevant).
74:21	74:24	Improper designation of record objections (401-403 – irrelevant).
75:9	75:12	Incomplete and not a valid counter-designation, as fairness or completeness requirements do not necessitate its inclusion with the designated content (106); improper designation of record objections (401-403 – irrelevant).
77:21	78:4	
80:4	80:14	
82:11	82:20	Hearsay; not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation (601, 602); calls for speculation.

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
84:7	84:23	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation (601, 602); hearsay (801, 802).
88:22	89:9	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation (601, 602); hearsay (801, 802).
99:3	99:6	
100:7	100:9	Lacks foundation (601, 602); not a valid counter-designation for completeness or fairness purposes (FRE 106); calls for speculation.
100:13	100:16	Lacks foundation (601, 602); not a valid counter-designation for completeness or fairness purposes (FRE 106).
100:20	100:22	Improper designation of record objection.
101:5	101:6	Improper designation of record objections (401-403 – relevance).
104:12	104:13	Improper designation of record objections (401-403 – relevance).
104:23	104:24	Improper designation of record objections (401-403 – relevance).
110:23	110:24	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – relevance).
112:1	112:7	Not a valid counter-designation for completeness or fairness purposes (106); calls for speculation; lacks foundation (601, 602).
112:12	113:3	Not a valid counter-designation for completeness or fairness purposes (106); calls for speculation; lacks

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		foundation (601, 602); hearsay (801, 802).
113:7	113:20	Not a valid counter-designation for completeness or fairness purposes (106); calls for speculation; lacks foundation (601, 602); hearsay (801, 802); hearsay within hearsay (804).
113:23	114:3	Not a valid counter-designation for completeness or fairness purposes (106).
120:17	120:19	Improper designation of record objections (401-403 – relevance).
121:2	121:7	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – relevance).
125:7	125:15	
126:20	127:2	Not a valid counter-designation for completeness or fairness purposes (106); hearsay (801, 802); lacks foundation / personal knowledge (601, 602).
127:5	127:9	Not a valid counter-designation for completeness or fairness purposes (106); lacks foundation / personal knowledge (601, 602).
127:14	128:10	Incomplete (starts with an answer, preceding question not designated) (106); not a valid counter-designation for completeness or fairness purposes (106); hearsay (801, 802); lacks foundation / personal knowledge (601, 602).
132:4	132:7	Not a valid counter-designation for completeness or fairness purposes (106).



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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
135:3	135:4	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
136:23	136:23	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
138:16	138:16	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
140:16	140:17	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
150:20	150:21	Improper designation of record objection, which is irrelevant (401-403), and the selective designation of certain record objections in the middle of designated testimony and not others is incomplete in and of itself.
154:12	154:14	Improper designation of record objection, which is irrelevant (401-403).
156:11	157:1	This is not a valid counter-designation to any of the designated content, and fairness/completeness requirements do not necessitate it being considered contemporaneously therewith (106).

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
158:1	158:4	Not a valid counter-designation for completeness or fairness purposes (106); hearsay (801, 802).
158:7	158:22	Not a valid counter-designation for completeness or fairness purposes (106).
158:25	159:8	
163:12	163:15	Lacks foundation (601, 602); not a valid counter-designation (106); hearsay (801, 802); calls for speculation.
163:21	164:2	Not a valid counter-designation for completeness or fairness purposes (106); lacks personal knowledge/ foundation (601, 602); hearsay (801, 802); calls for speculation.
164:9	164:17	Not a valid counter-designation for completeness or fairness purposes (106); lacks personal knowledge/ foundation (601, 602); calls for speculation.